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Hon. Paul B. Snyder
Chapter 11
Hearing date: *Ex Parte*
Hearing time: *Ex Parte*
Hearing Location: *Ex Parte*
Response Date:

6 Attorneys for Debtor

7 UNITED STATES BANKRUPTCY COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON

9 In re:

10 AUTOMOTIVE ELECTRIC DISTRIBUTORS,
11 INC.

12 Debtor.

Case No.: 14-46321-PBS

DEBTOR'S AMENDED
ADMINISTRATIVE MOTION FOR
ORDER SETTING CLAIMS BAR DATE
*Tgr rregu'F m056+

15 Automotive Electric Distributors, Inc., the debtor and the debtor in possession, (the
16 "Debtor"), respectfully move this court, pursuant to LBR 3001-1, for entry of an *ex parte* order
17 setting the claims bar date in this case. The Debtor requests that the Court sets the claims bar
18 date for March 15, 2015. Pursuant to LBR 9013-1(g), this *ex parte* motion is on an
19 administrative matter. In support, the Debtors represent:

- 20
- 21 1. The Debtor filed its chapter 11 petition on November 26, 2014.
 - 22 2. On December 3, 2014, the Court entered the Debtor's Cash Collateral Order, Dkt 23
23 (amended at Dkt. 34).
 - 24 3. The Debtor has one senior, secured creditor, Heritage Bank, with a blanket lien encumbering
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- 26

1 all of the Debtor's assets of value. Heritage Bank's collateral at the Debtor is insufficient to
2 fully secure more than 50% of the Debtor's debts to Heritage Bank.

- 3 4. Beyond Heritage Bank, the Debtor's debts consist predominately of: (1) approximately \$1.7
4 million of general unsecured debt to some 175 trade creditors, and; (2) approximately \$1.9
5 million debt from deferred patronage dividends to a combined 170 active¹ and inactive
6 members of the Debtor.
- 7 5. The Debtor anticipates filing a disclosure statement and plan in January 2015.
- 8 6. The Debtor believes that it is in the best interests of all parties in interest to set the claims bar
9 date for March 15, 2015. This will give all creditors sufficient time to prepare and file their
10 claims and will give all parties in interest the opportunity to understand the magnitude of
11 filed claims.
- 12 7. The Debtor's proposed form of Order Setting Claim Bar Date (the "Order") requires the
13 Debtor to serve notice of the claim bar date on all creditors. A copy of the Order is attached
14 as Exhibit A.
15
16

17 Dated: December 7, 2014.

18 Respectfully submitted by:

19 _____
20 /s/ Joseph A. Field
21 Joseph A. Field, WSBA #24705
22 Field Jerger LLP
23 Email: joe@fieldjerger.com
24 621 SW Morrison St. #1225

25 ¹ The Debtor is a coop owned by its members. The Debtor's active members currently operate auto parts stores and
26 purchase auto parts from the Debtor. The Debtor's inactive members formerly owned auto parts stores.

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Attorneys for Debtor

Exhibit A

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8 UNITED STATES BANKRUPTCY COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON

10 In re:

11 AUTOMOTIVE ELECTRIC DISTRIBUTORS,
12 INC.

13 Debtor.
14

Case No.: 14-46321-PBS

EX PARTE ORDER
SETTING CLAIMS BAR DATE

15
16 This matter came before the Court on the administrative motion of Automotive Electric
17 Distributors, Inc., the debtor and the debtor in possession, (the “Debtor”), pursuant to LBR 3001-
18 1 for an *ex parte* order setting the claims bar date in this case to be March 15, 2015. The Court
19 considered the Debtor’s motion and being fully informed in the premise and for good cause
20 shown,
21

22 IT IS HEREBY ORDERED THAT:

- 23 1. The deadline to file a proof of claim in this case (claims bar date) shall be March 15,
24 2015.
25 2. The Debtor shall serve a copy of this order and an accompanying notice to all creditors of
26

record within two business days of entry of this order and shall include notice of the claims
bar date in the disclosure statement.

#

Presented by:

/s/ Joseph A. Field

Joseph A. Field, WSBA #24705

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Hon. Paul B. Snyder
Chapter 11

8 Attorneys for Debtor

9 UNITED STATES BANKRUPTCY COURT
10 FOR THE WESTERN DISTRICT OF WASHINGTON

11 In re:

Case No.: 14-46321-PBS

12 AUTOMOTIVE ELECTRIC DISTRIBUTORS,
13 INC.

CERTIFICATE OF SERVICE

14 Debtor.

15 On the date indicated below, the undersigned served the forgoing submission on all
16 parties of record who have appeared in this matter, by sending them copies via the Bankruptcy
17 Court's CM/ECF electronic filing system.

18 Dated: December 7, 2014.

19 /s/ Joseph A. Field
20 Joseph A. Field, WSBA # 24705
21 Field Jerger LLP
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